

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND
(Greenbelt Division)**

IN RE:

LUIS FRENANDO CORREA

Debtor.

Case No. 19-15478

Chapter 7

TRUSTEE’S APPLICATION TO EMPLOY REALTOR FOR ESTATE

COMES NOW Janet M. Nesse, Trustee (“Trustee”) of the Chapter 7 bankruptcy estate of Luis Frenando Correa ("Debtor"), by and through her undersigned attorneys, McNamee, Hosea, Jernigan, Kim, Greenan & Lynch, P.A., and in support of her Application to Authorize the Retention of Realtor, pursuant to 11 U.S.C. § 327, respectfully represents as follows:

1. This case was filed on April 23, 2019, under Chapter 7 of the United States Bankruptcy Code.
2. The Trustee is the duly qualified Trustee of this case.
3. The Trustee proposes to hire Lauren Kline of Long and Foster Real Estate as the realtor (“Realtor”), in connection with the sale of the Debtors’ interest in the real property located at 23803 Branchbrier Way, Clarksburg, MD 20871 (“Property”).
4. In order to liquidate the Property for the benefit of the estate and its creditors it will be necessary to retain a realtor.
5. The Trustee is satisfied that the best and highest recovery to the estate will come from a private sale of the Property.
6. The Realtor is to receive a commission of 6% of the gross sales price if the Property is sold at private sale as result of her effort. The rate of commission requested is

customary for the sale of real property in Maryland.

7. The Trustee believes and alleges that employment of the aforesaid Realtor is in the best interest of the estate, and that the Court should approve such employment as provided in 11 U.S.C. Section 327 (a). The Realtor's Verified Statement evidencing her disinterestedness, within the meaning of 11 U.S.C. § 327 (a), is attached hereto as Exhibit A.

WHEREFORE, Janet M. Nesse, the Chapter 7 Trustee, respectfully requests that this Court:

- a. Grant the Trustee's Application to Authorize Retention of Realtor for Estate;
- b. Authorize the Trustee to retain Lauren Kline of Long and Foster Real Estate on the terms and conditions set forth above;
- c. Authorize the Trustee to pay the Realtor her commission from the proceeds of the sale at closing without further order of the Court; and
- d. Grant such other and further relief as is just and proper.

Dated: June 11, 2019

Respectfully submitted,

/s/ Janet M. Nesse
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Counsel for Chapter 7 Trustee

CERTIFICATE OF SERVICE

I hereby certify that on the **11th day of June, 2019**, a copy of the foregoing Application to Authorize the Retention of Realtor for Estate, was served via first class mail, postage prepaid, upon the following:

Office of the U.S. Trustee
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/s/ Janet M. Nesse
Janet M. Nesse, Trustee